



OTTcommunications

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Received & Inspected

JUL - 1 2014

FCC Mail Room

June 27, 2014

**Via US Mail**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 10-90, FCC Form 481 Data  
Granby Telephone LLC d/b/a OTT Communications  
SAC: 110036**

Dear Ms. Dortch:

Enclosed for filing, please find an original and three (3) confidential versions of Granby Telephone LLC d/b/a OTT Communications' Form 481, along with a Request for Confidentiality, pursuant to 47 C.F.R. §§ 0.457 and §0.459. In addition, please find four (4) copies of the redacted version of the Five-Year Plan (Line 112 of Form 481), which was filed electronically with the Commission on June 27, 2014.

If you have any questions or concerns, you may reach me at (207) 992-9920 or [trina.bragdon@ottcommunications.com](mailto:trina.bragdon@ottcommunications.com).

Sincerely,

Trina M. Bragdon  
General Counsel  
OTT Communications

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

0+3

OTT communications  
900D Hammond Street  
Bangor, Maine 04401

JUL - 1 2014

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**CONFIDENTIAL FINANCIAL INFORMATION-SUBJECT  
TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90,  
07-135, 05-337, 03-109, CC DOCKET NO. 01-92, 96-45, GN  
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE  
THE FEDERAL COMMUNICATIONS COMMISSION**

June 27, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Granby Telephone LLC d/b/a OTT  
Communications  
Study Area Code: 103315  
Request for Confidentiality**

Dear Ms. Dortch:

Granby Telephone LLC d/b/a OTT Communications (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

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Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.<sup>4</sup>

3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.
4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company’s network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans “should describe the carrier’s network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories.”<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company’s existing network, including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019. In addition, the filing includes confidential, competitively sensitive information regarding project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades as well as operating costs associated with maintaining the network including depreciation for investments that have already been made.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company’s serving territory, and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company’s customers which would place the Company at a competitive disadvantage.

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<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) (“*March 5, 2013 Order*”) at para 9 citing Section 54.202(a) (1) (ii).

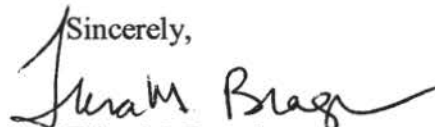


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6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, the Company respectfully requests that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,  
  
Trina M. Bragdon  
General Counsel  
OTT Communications

<010> Study Area Code	110036	
<015> Study Area Name	GRANBY TEL & TEL -MA	JUL - 1 2014
<020> Program Year	2015	
<030> Contact Name: Person USAC should contact with questions about this data	Megan Cobleigh	FCC Mail Room
<035> Contact Telephone Number: Number of the person identified in data line <030>	2079929050 ext.	
<039> Contact Email Address: Email of the person identified in data line <030>	megan.cobleigh@ottcommunications.com	

<100> Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)
<200> Outage Reporting (voice)	(complete attached worksheet)	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		
<300> Unfulfilled Service Requests (voice)	0	
<310> Detail on Attempts (voice)	(attach descriptive document)	
<320> Unfulfilled Service Requests (broadband)	0	
<330> Detail on Attempts (broadband)	(attach descriptive document)	
<400> Number of Complaints per 1,000 customers (voice)		
<410> Fixed	1.9	
<420> Mobile	0.0	
<430> Number of Complaints per 1,000 customers (broadband)		
<440> Fixed	0.0	
<450> Mobile	0.0	
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	
<510> 110036ma510.pdf	(attached descriptive document)	
<600> Functionality in Emergency Situations	(check to indicate certification)	
<610> 110036ma610.pdf	(attached descriptive document)	
<700> Company Price Offerings (voice)	(complete attached worksheet)	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	
<800> Operating Companies and Affiliates	(complete attached worksheet)	
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	
<1000> Voice Services Rate Comparability	(check to indicate certification)	
<1010>	(attach descriptive document)	
<1100> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	
<1110>	(complete attached worksheet)	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

<2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	
<2005>	(complete attached worksheet)	

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	
<3005>	(complete attached worksheet)	

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<010>	Study Area Code	110036
<015>	Study Area Name	GRANDY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5		
<111>	year plan" filed with the FCC?	(yes / no)	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

110036na112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Page 3

**Figure 1.** The effect of the number of trials on the mean accuracy of the responses. The error bars represent the standard error of the mean.

<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

[illegible]



<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ctcommunications.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

[illegible]



<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobligh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079923030 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobligh@ottcommunications.com

(71)

[illegible]

[illegible]

<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL - MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	20799229050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

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<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929650 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

Please check this box to confirm no terrestrial backhaul  
<1120> options exist within the supported area pursuant to § 54.313(G)

☐

Please check this box to confirm the reporting carrier offers  
<1130> broadband service of at least 1 Mbps downstream and 256 kbps  
upstream within the supported area pursuant to § 54.313(G)

☐



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<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

A large empty rectangular box intended for an attached document.

Name of Attached Document

<1220> Link to Public Website

HTTP [www.ottcommunications.com/searchnpanxx.php?npa=413&xxx=467](http://www.ottcommunications.com/searchnpanxx.php?npa=413&xxx=467)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☐

<1222> Details on the number of minutes provided as part of the plan, ☐

<1223> Additional charges for toll calls, and rates for each such plan. ☐

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<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@attcommunications.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

<b>Incremental Connect America Phase I reporting</b>		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
<b>Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))</b>		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
<b>Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))</b>		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
<b>Connect America Phase II Reporting (47 CFR § 54.313(e))</b>		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	<div style="border: 1px solid black; height: 40px; width: 200px;"></div>

Name of Attached Document Listing Required Information

# REDACTED - FOR PUBLIC INSPECTION

<010> Study Area Code	110016
<015> Study Area Name	GRANDY TEL & TEL -MA
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035> Contact Telephone Number - Number of person identified in data line <030>	2075922950 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@communications.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan  
Milestone Certification [47 CFR § 54.313(f)(1)(i)]

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- (3012) Community Anchor Institutions [47 CFR § 54.313(f)(1)(ii)]

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)(2)]  
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ Yes ☒ No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)  
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

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- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited?

(Yes/No) ☒ Yes ☒ No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications  
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows  
(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐  
☐  
☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.  
(3023) Underlying information subjected to a review by an independent certified public accountant  
(3024) Underlying information subjected to an officer certification.  
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐  
☐  
☐  
☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information



<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: GRANBY TEL & TEL -MA	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2014
Printed name of Authorized Officer: Dennis Andrews	
Title or position of Authorized Officer: Senior Vice President	
Telephone number of Authorized Officer: 2565861420 ext.	
Study Area Code of Reporting Carrier: 110036	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



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<010> Study Area Code	110036
<015> Study Area Name	GRANBY TEL & TEL -MA
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035> Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED - FOR PUBLIC INSPECTION

Attachments

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Granby Telephone LLC  
Line 510

**Service Quality Standards and Consumer Protection Rules**

The company complies with applicable service quality standards and consumer protections, including, without limitation: (1) reporting major service interruptions to the Massachusetts Department of Telecommunications and Cable (MADTC) in a manner consistent with its requirements, i.e. calling and/or emailing the Director of the Competition Division, Karlen Reed, during extended outages or emergency weather conditions; (2) maintaining local service tariffs on file, giving notice of changes to such tariffs pursuant to 220 CMR 5.00, and making rate and service information available for public inspection at the company's offices and on its website; (3) Complying with D.P.U. 18448 in regards to its Billing and Termination Practices section, including, but not limited to clearly listing all charges and credits on customers' bills, as well as providing at least fifteen days notice of discontinuance of service (the company cites D.P.U. 18448 in its Tariff M.D.T.C. No. 6); (4) providing full and prompt investigation of, and response to, customer complaints in accordance with dispute resolution procedures established by the MADTC; (5) providing access to enhanced 911 pursuant to M.G.L. c. 6A, s. 18H; (6) participating in a statewide system to assist the hearing impaired and providing service discounts for the deaf, hard of hearing, blind and visually impaired pursuant to M.G.L. c. 6A, s. 18B(m) and M.G.L. c. 166, s. 15(E); (7) complying with federal CPNI rules and other applicable consumer privacy protection requirements, including training of employees that have access to CPNI on the rules and procedures for protecting account information and authenticating callers pursuant to 201 CMR 17.00 and in compliance with M.G.L. c. 93H; and (8) implementing procedures that are consistent with the FTC's guidance on measures to detect/prevent identity theft (Red Flag).

In addition, the company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service, and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.



REDACTED - FOR PUBLIC INSPECTION

**Granby Telephone LLC  
Line 610**

**Functionality in Emergency Situations**

The company certifies it is able to function in emergency situations. The company operates a centralized 24 x 7 Network Operations Center (NOC) that monitors the company's equipment and acts as the single point of contact for all customers. The NOC is responsible for alerting the proper personnel in the event of an emergency situation, and that personnel then contacts Karlen Reed, Director of the Competition Division of the Department of Telecommunications and Cable. In addition, the company recently established contact protocols with Undersecretary of Forensic Science and Technology, Curtis Wood, in order to alert and coordinate with Executive Office of Public Safety and Security in the event of an emergency. The Massachusetts Department of Telecommunications and Cable can contact the company in an emergency following escalation list below:

1. NOC Tech Network Operation Center 1-877-643-6426
2. NOC Manager, Stacey Brouse, Office 207-992-9958, Cell 207-949-4514
3. Director of NOC, Wade Moffett, Office 207-992-9942, Cell 207-615-8470
4. Senior Vice President, Rob Souza, Office 207-688-8241, Cell 207-615-8470

In addition to local personnel, the company has qualified employees and construction equipment that would be dispatched to Massachusetts in the event of an emergency situation. The travel time is approximately three (3) hours from the southern Maine facility to Granby, Massachusetts. In-house expertise includes the ability to replace and splice fiber optic and copper cables and pole/cable transfer work. Available equipment ready for immediate use includes bucket trucks that are capable of placing and repairing aerial cables, fiber splicing trailers, installation vans, and generators. The company has an on-site inventory of fiber optic cable, copper cable, drop (customer service) wire, hardware, splice closures and materials, and general supplies that are either at the Granby location or can be transported from the southern Maine facility. In addition the company's managers of technicians and operations staff carry company-provided cells phones that can be used to maintain a communication link in the event of a major outage on our network or during emergency situations. In the event that the company does not have enough employees for heightened emergency situations, the company has the ability to dispatch additional manpower through out-of-house contractors that are used on a regular basis.



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<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

[illegible]

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<010>	Study Area Code	110036
<015>	Study Area Name	GRANBY TEL & TEL -MA
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com
<810>	Reporting Carrier	Granby Telephone LLC
<811>	Holding Company	Otelco Inc.
<812>	Operating Company	Granby Telephone LLC

[illegible]

REDACTED - FOR PUBLIC INSPECTION

**Five-Year Network Improvement Plan**  
**For Granby Telephone LLC d/b/a OTT Communications**

In its *USF/ICC Transformation Order* and subsequent Orders, the Federal Communications Commission ("FCC" or "Commission") requires Eligible Telecommunications Carriers ("ETCs") to submit a five-year build-out plan in a manner consistent with Section 54.202(a)(1)(ii) of the Commission's Rules by July 1, 2014 and to submit annual progress reports thereafter.<sup>1</sup> Section 54.202(a) (1) (ii) states in part that ETCs are to [s]ubmit a five-year plan that describes with specificity proposed improvements or upgrades to the [ETC's] network throughout its proposed service area. Each [ETC] shall estimate the area and population that will be served as a result of the improvements . . . ."<sup>2</sup>

In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved

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<sup>1</sup> See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform—Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-61 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*) at Para. 587; *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011); see also *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 12-147 (rel. Feb. 12, 2012) at Para. 5 (amending Section 54.313(a)(1) to clarify this requirement); *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Third Order on Reconsideration, FCC 12-52 (rel. May 14, 2012) at Para. 10 (changing the filing deadline for the annual reports from April 1 to July 1); *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at Para's. 4, 6-9. Delaying Five Year Plan until July 1, 2014 see WC Docket No. 10-90, Order, DA 13-1115, Para. 8 (released May 16, 2013).

<sup>2</sup> 47 C.F.R. § 54.202(a) (1) (ii).

locations in rate-of-return service territories.”<sup>3</sup> Granby Telephone LLC d/b/a OTT Communications (“Granby”) is a rate-of-return carrier ETC and hereby submits its five-year network improvement plan.

**I. The Challenges Faced by Granby in Providing Voice and Broadband to its Rural Service Area**

**A. Description of Granby and its Service Area**

Granby currently serves the town of Granby in central Massachusetts, which is mostly a rural residential and agricultural area. Granby currently serves [REDACTED] voice and [REDACTED] data lines. The Holyoke Range is in the northern part of Granby, this geography, along with the weather and rural nature of the territory, leads to higher costs to both deploy and maintain services.

**B. The Exchanges Contained Within Granby’s Study Area**

Granby serves the combined exchange area(s) of:

Granby	
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**II. Granby Has Used and Will Use Universal Service Support Only For the Intended Purposes**

Section 254(e) of the Communications Act of 1934, as amended, requires ETCs to use Universal Service support (“USF”) “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”<sup>4</sup> Pursuant to Section 54.314 of the FCC’s rules, in order for state-designated ETCs to receive USF for the coming year, states must annually file certifications by October 1 stating that all

<sup>3</sup> March 5, 2013 Order at Para. 9 citing Section 54.202(a) (1) (ii).

<sup>4</sup> 47 U.S.C. § 254(e).